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*Attorneys for Defendants Apartment Management
Consultants, LLC, and Rene Richardson*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA *ex rel.*
PEGGY THORNTON, Relator,

and

PEGGY THORNTON,

Plaintiff,

vs.

PORTOLA DEL SOL OPERATOR, LLC, a
foreign limited-liability company; TMIF II
PORTOLA, LLC, a foreign limited-liability
company; APARTMENT MANAGEMENT
CONSULTANTS, LLC, a foreign limited
liability company; and RENE
RICHARDSON, as AGENT of PORTOLA
DEL SOL OPERATOR, LLC,

Defendants.

Case No. 2:21-cv-01123-APG-BNW

**Stipulation and Order to Extend Deadline
for Plaintiff Peggy Thornton and
Defendants Apartment Management
Consultants, LLC and Rene Richardson to
submit Reply supporting their Joint
Motion to Approve Settlement and
Distribution of Settlement Funds
[ECF No. 124]**

(First Request)

1 Defendants Apartment Management Consultants, LLC and Rene Richardson (collectively
2 “AMC”); Plaintiff-Relator Peggy Thornton; and Real Party in Interest the United States of
3 America, by and through their respective undersigned counsel, hereby stipulate to extend
4 Ms. Thornton and AMC’s deadline to submit a reply in support of their joint motion to approve
5 settlement and distribution of settlement funds (“Joint Motion”) by three weeks, until
6 February 20, 2025, with the following background and reasons:

7 1. Ms. Thornton and AMC submitted the Joint Motion (ECF No. 124) on January 8,
8 2025.

9 2. As explained in the Joint Motion, Ms. Thornton and AMC have agreed on a
10 settlement amount to resolve claims against the latter but required Court approval given that the
11 United States had not stated whether it had any objection to the settlement terms.

12 3. The United States subsequently filed a partial objection to the Joint Motion, stating
13 that it does *not* ultimately object to settlement or the settlement amount but requires any
14 settlement to conform to its specifications, including distribution of settlement funds directly to
15 the United States. ECF No. 128.

16 4. The United States, Ms. Thornton, and AMC have since conferred and agreed to
17 jointly work on a written settlement agreement based on the Government’s specifications.

18 5. Execution of the settlement agreement would result in a stipulation dismissing the
19 claims against AMC and moot the need for Court approval of the settlement.

20 6. Because the Joint Motion itself would likewise be rendered moot, preventing
21 Ms. Thornton and AMC from expending additional attorney’s fees to submit a reply in support of
22 their Joint Motion would be conducive to settlement and judicial economy.

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7. The United States, Ms. Thornton, and AMC agree that this stipulation is entered into in good faith and will not unduly delay proceedings.

IT IS SO STIPULATED.

Dated: January 30, 2025.

SNELL & WILMER L.L.P.

By: /s/ Gil Kahn

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*Attorneys for Defendant Apartment
Management Consultants, LLC and Rene
Richardson*

Dated: January 30, 2025.

NEVADA LEGAL SERVICES

By: /s/ Kristopher Pre

Kristopher Pre
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530 South 6th Street
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Attorneys for Relator

Dated: January 30, 2025.

U.S. ATTORNEY'S OFFICE FOR THE DISTRICT OF NEVADA

By: /s/ Christian R. Ruiz

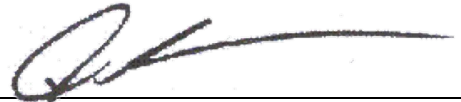
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Attorneys for Real Party in Interest the United States of America

ORDER

Good cause appearing, Ms. Thornton and AMC's stipulation is **GRANTED**. Ms. Thornton and AMC's deadline to submit a reply in support of their joint motion to approve settlement and distribution of settlement funds extended to and including February 20, 2025.

IT IS SO ORDERED.



CHIEF UNITED STATES DISTRICT JUDGE

DATED: January 31, 2025

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